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April 10, 2024

By ECF

United States Magistrate Judge Joseph A. Marutollo
United States District Court
Eastern District of New York
225 Camden Plaza East
Brooklyn, New York 11201

Re: Dalmau v. City of New York
No. 22-CV-06326 (DG) (JAM)

Dear Judge Marutollo:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York for the defendant City of New York in the above-referenced matter. Defendant writes, with Plaintiff's consent, to request 1) an adjournment of the settlement conference scheduled for April 12th and 2) an extension of time to file a pre-motion letter due April 22nd. This is Defendant's first request for an adjournment of the settlement conference and second request for an extension of time to file a pre-motion letter for summary judgment. The granting of these requests will not interfere with any other deadlines.

An adjournment of the settlement conference is needed for Defendant to obtain settlement authority from the Comptroller's Office and the New York City Department of Sanitation, in order to respond to Plaintiff's April 4, 2024 settlement demand before the conference in accordance with Your Honor's Individual Practices and Rules.

Defendant requests that the settlement conference be rescheduled to May 29th¹ or on a date after May 29th, preferably on a Monday to Thursday, that is convenient for the Court. The parties are available on May 29, May 30, June 3, June 4, June 5, and June 11th.

Defendant also requests, with Plaintiff's consent, for an extension of time to file a pre-motion letter regarding dispositive motions to a date 10 days after the rescheduled settlement conference to avoid unnecessary litigation and litigation costs in the event a settlement can be reached at the conference.

¹ Plaintiff is out of the country from April 26 to May 22, 2024.

Defendant thanks the Court for its consideration of this request.

Respectfully submitted,

/s/
Dominique Anglade
Assistant Corporation Counsel

cc: Steven Warshawsky (via ECF)
The Warshawsky Law Firm
Attorneys for Plaintiff